

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

DANIEL UMPA, on behalf of himself and
all others similarly situated,

Plaintiffs,

v.

THE NATIONAL ASSOCIATION OF
REALTORS, HOMESERVICES OF
AMERICA, INC., BHH AFFILIATES, LLC,
HSF AFFILIATES, LLC, THE LONG &
FOSTER COMPANIES, INC., KELLER
WILLIAMS REALTY, INC., COMPASS,
INC., EXP WORLD HOLDINGS, INC.,
EXP REALTY, LLC, REDFIN
CORPORATION, WEICHERT
REALTORS, UNITED REAL ESTATE,
HANNA HOLDINGS, INC, DOUGLAS
ELLIMAN, INC., DOUGLAS ELLIMAN
REALTY, LLC, AT WORLD
PROPERTIES, LLC, THE REAL
BROKERAGE, INC., REAL BROKER,
LLC, REALTY ONE GROUP, INC.,
HOMESMART INTERNATIONAL, LLC,

Defendants.

Case No. 4:23-cv-00945-SRB

Hon. Stephen R. Bough

Oral Argument Requested

MOTION OF COMPASS, INC. TO STRIKE CLASS ALLEGATIONS

Pursuant to Fed. R. Civ. P. 12(f), defendant Compass, Inc. (“Compass”), by its attorneys, moves to strike Plaintiff’s allegation of a nationwide class from the Class Action Complaint (“Complaint”) on the basis that Plaintiff’s alleged class includes certain putative class members who entered into agreements with Compass to arbitrate their disputes and putative class members who waived their ability to participate in class actions against Compass. In support of this

motion, Compass relies on its brief that is being filed concurrently and the Declaration of Chahira Solh accompanying that brief – as well as the pleadings and records on file with this Court and such argument as may be presented at any hearing on this motion. As set forth in the accompanying brief, the overbroad class action allegations should be stricken from the complaint.

Dated: February 26, 2024

Respectfully submitted,

/s/ Daniel A. Sasse

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Attorneys for Defendant Compass, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on February 26, 2024, a copy of the foregoing document was electronically filed through the ECF system and will be sent electronically to all persons identified on the Notice of Electronic Filing.

/s/ Daniel A. Sasse
Daniel A. Sasse
Attorney for Defendant Compass, Inc.